IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

LONGHORN HD LLC,

Plaintiff,

V.

QUANTA COMPUTER INCORPORATED,

Defendant.

S

Case No. 2:19-cv-00064-JRG

JURY TRIAL DEMANDED

S

Defendant.

MOTION FOR ISSUANCE OF LETTERS ROGATORY FOR SERVICE OF PROCESS ON DEFENDANT QUANTA COMPUTER INCORPORATED

Pursuant to Federal Rule of Civil Procedure 4(h)(2) and 4(f)(2)(B), Plaintiff Longhorn HD LLC ("Longhorn") respectfully requests that this Court issue a Request for Judicial Assistance ("Letters Rogatory") (attached as Exhibit A), addressed to the appropriate judicial authority in Taiwan, requesting that the Taiwanese authority assist in effecting service of process upon Defendant Quanta Computer Incorporated ("Quanta").

Longhorn filed its Complaint (Dkt. 1) on February 25, 2019. This Court issued a Summons as to Quanta on February 26, 2019. Upon information and belief, Quanta is a publicly-listed company with an address of Quanta Research and Development, Complex No. 211, Wenhau 2nd Road, Guishan District Taoyuan 333, Taiwan, R.O.C. Accordingly, Longhorn respectfully requests that this Court issue Letters Rogatory seeking the assistance of the Taiwanese authority in effecting service of the Complaint and Summons upon Quanta.

Longhorn respectfully requests that the Court return (a) the original copy of the signed and issued Letters Rogatory, and (b) two certified copies to the undersigned counsel. The United

States Department of State will oversee transmission of the Letters Rogatory to Taiwan through diplomatic channels as provided in 28 U.S.C. § 1781(a)(2). Longhorn will reimburse this Court for any expenses incurred in connection with the issuance and return of the Letters Rogatory. Counsel for Longhorn will ensure the delivery of materials and fees in accordance with U.S. and Taiwanese procedure.

Dated: March 20, 2019 Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant NY Bar No. 2219392

Email: afabricant@brownrudnick.com

Peter Lambrianakos NY Bar No. 2894392

Email: plambrianakos@brownrudnick.com

Vincent J. Rubino, III NY Bar No. 4557435

Email: vrubino@brownrudnick.com

John A. Rubino NY Bar No. 5020797

Email: jrubino@brownrudnick.com

BROWN RUDNICK LLP

7 Times Square New York, NY 10036 Telephone: (212) 209-4800

Fax: (212) 209-4801

Justin Kurt Truelove Texas Bar No. 24013653

Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC

100 West Houston Marshall, Texas 75670 Telephone: (903) 938-8321

Facsimile: (903) 215-8510

ATTORNEYS FOR PLAINTIFF, LONGHORN HD LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on March 20, 2019, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant

Alfred R. Fabricant